

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Lisa Nguyen

Debtor

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Case No: 18-16367

Chapter 13

**OBJECTION OF MOTION FOR IN REM RELIEF FROM THE
AUTOMATIC STAY**

Lisa Nguyen, debtor in the above-captioned case (the “Debtor”), through her undersigned counsel, Gerald R. Clarke, Esquire, hereby objects to Motion to for In Rem Relief From the Automatic Stay filed by Movants Mark Knouse, Lynn Brinker and Kim Beidler:

1. The Debtor has made all post-petition mortgage payments on a timely basis.
2. The mortgage agreement does not require the Debtor to pay 1/12 of real estate taxes in addition to the monthly mortgage payment as averred in the Motion.
3. Accordingly, the Debtor has not defaulted on her mortgage since her bankruptcy filing.
4. The Debtor has been in contact with Montgomery County Tax Bureau to work out payment arrangements.
5. The Debtor has attempted to make arrangements with the Movants in order to stay in the property and suggested arrangements have been denied.
6. The filing of this bankruptcy matter and the previous bankruptcy matter was filed for the sole purpose of allowing the Debtor to remain in the house and not, as suggested by the Movant, for the purpose of preventing foreclosure on the property.

WHEREFORE, the Debtor respectfully requests that the Court enter an order in the form annexed hereto, denying the Motion of the Movant.

Dated: February 18, 2019

/s/ Gerald R. Clarke

Gerald R. Clarke

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**ORDER DENYING MOTION FOR RELIEF
OF AUTOMATIC STAY**

AND NOW, this _____ day of _____, 201____, upon consideration of the Motion for relief from the automatic stay filed by the Movant, said motion is denied.

BY THE COURT

Date: _____

Hon.
Bankruptcy Judge

Cc: Debtor
Counsel for Debtors
Office of the U.S. Trustee
Standing Chapter 13 Trustee
Creditors